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John H. Thompson
Associate Director for Decennial Census
Bureau of the Census
Suitland and Silver Hills Road
Building 2, Room 3586
Suitland, MD 20233

Dear Associate Director Thompson:

The Consortium of Social Science Associations (COSSA), an advocacy organization for the social and behavioral sciences, strongly supports the Proposed Rule published in the June 20 edition of the *Federal Register* that gives the Director of the Bureau of the Census the final authority over the decision of whether or not to release statistically-adjusted numbers to the states for the purpose of redistricting and distributing Federal aid. COSSA, a membership organization, is supported by more than 100 professional associations, scientific societies, research institutes, universities and colleges, and think tanks. A list of our members is attached.

The issue of adjusting census data through sound statistical methods has been a lightning rod of partisan fighting. The proposed rule is a thoughtful attempt to remove politics from the decision of releasing statistically-adjusted data. The decennial census must be an open and transparent process to allay fears of political manipulation. The Secretary of Commerce was surely cognizant of this fact when crafting the procedures for deciding on the release of adjusted census data. The Census Bureau Director is given final authority for releasing data only after receiving a recommendation from a steering committee comprised of distinguished career professionals from the Census Bureau. As written in the proposed rule this committee, called the Executive Steering Committee on A.C.E. [Accuracy Coverage and Evaluation] Policy (ESCAP), will be comprised of the: Deputy Director and Chief Operating Officer; Principal Associate Director and Chief Financial Officer; Principal Associate Director for Programs; Associate Director for Decennial Census, who will also serve as the chair of ESCAP; Assistant Director for Decennial Census; Associate Director for Demographic Programs; Associate Director for Methodology and Standards; Chief of the Planning, Research, and Evaluation Division; Chief of the Decennial Management Division; Chief of the Decennial Statistical Studies Division; Chief of the Population Division; and Senior Mathematical Statistician. Once the Director has received the report, a final determination will be made. Regardless of the outcome of the Director's decision, the report of the ESCAP committee will be made public. This process certainly allows for unencumbered public scrutiny which is so vital to public confidence in the data produced by the Census Bureau.

By delegating the authority over the release of statistically-adjusted data for the purposes of States' redistricting and distribution of hundreds of millions of dollars in Federal aid, the Secretary of Commerce is acknowledging that the professionals at the Census Bureau have the expertise to determine

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the efficacy of releasing scientific statistically-adjusted data. As noted in the proposed rule, the decision to release adjusted data "turns entirely on operational and methodological implementation entirely within the expertise of the Bureau of the Census." It is only logical to provide the statistical experts from the Bureau this authority.

During the 1990 Census, the Secretary of Commerce overruled a recommendation from the Census Bureau Director advocating the use of scientifically adjusted data. This resulted in a census with an undercount of 8 million and an overcount of 4 million for a net undercount of 4 million. These 4 million undercounted individuals were largely from minority groups. Perhaps the most important aspect of the rule, therefore, is that the Bureau Director's final decision cannot be overturned by the Secretary of Commerce. The proposed rule judiciously notes: "Review of the Director's decision by the Secretary of Commerce would at a minimum create the appearance that considerations other than those relating to statistical science were being taken into account, and could well allow the decision to be based on such irrelevant considerations. There is absolutely no role for non-scientific considerations in this process." It should be noted that the proposed rule has the bipartisan support of two former Census Bureau Directors: Republican-appointed Barbara Everitt Bryant and Democratic-appointed Martha Farnsworth Riche.

As a result of the 1990 Census undercount, and the long history of census undercounts, the National Academy of Sciences recommended using scientific statistical methods to correct the problem. The experts at the Census Bureau crafted the procedures for the 2000 Census based on years of experience and scientific expertise. The procedure for scientific statistical sampling, known as Dual Systems Estimation, uses a scientifically-drawn sample of the population to compare with and improve the directly enumerated population count. Therefore, if the Census Bureau Director decides to release scientifically adjusted data to the States on April 1, 2001 it will not be done capriciously, but to improve the census numbers. The proposed rule wisely places this decision in the hands of the statistical experts at the Census Bureau whose only interest is in producing the most reliable and accurate census possible.

The Consortium of Social Science Associations heartily supports the proposed rule. Please do not hesitate to contact me with any further questions or comments at 202/842-3525 or dahess@erols.com.

Sincerely,



David A. Hess
Associate Director for Public Affairs

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